

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

ADAM A. REEVES (NYBN 2363877)
ROBERT S. LEACH (CABN 196191)
Assistant United States Attorneys
450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
Fax: (415) 436-7234
E-Mail: Adam.Reeves@usdoj.gov
Robert.Leach@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BASSAM YACOUB SALMAN
a/k/a Bassam Jacob Salman,

Defendant.

No. CR 11-0625 EMC

STIPULATION AND ~~[PROPOSED]~~
ORDER EXCLUDING TIME

WHEREAS, on October 26, 2011, the United States produced approximately 937,000
pages of documents and other materials to counsel for the defendant;

WHEREAS, counsel for the defendant needs time to review the discovery;

WHEREAS, the Court held a status conference on May 9, 2012, and set this case for trial
on March 4, 2013;

WHEREAS, in an order dated May 23, 2012, and with the consent of the defendant, the
Court concluded that the exclusion of time from May 9, 2012, to March 4, 2013, should be made
under 18 U.S.C. § 3161(h)(7)(B)(iv);

STIP. & ~~[PROPOSED]~~ ORDER EXCLUDING TIME
CR 11-0625 EMC

1 WHEREAS, on December 19, 2012, the Court reset the trial date to March 18, 2013, and
2 set a pre-trial conference on February 26, 2013;

3 WHEREAS, on January 8, 2013, the Court granted the defendant's motion to continue
4 the trial and reset the trial date to June 24, 2013;

5 WHEREAS, a failure to grant the continuance would deny defense counsel the reasonable
6 time necessary for effective preparation, taking into account the exercise of due diligence, and
7 under the circumstances, the ends of justice served by a reasonable continuance outweigh the
8 best interest of the public and the defendant in a speedy trial;

9 WHEREAS, the defendant consents to the exclusion of time from January 8, 2013, to
10 June 24, 2013;

11 THEREFORE, it is hereby stipulated by and between the parties, through their respective
12 counsel of record, that the period of time from January 8, 2013, to June 24, 2013, shall be
13 excluded in computing the time within which the trial of the offenses alleged in the Indictment
14 must commence under 18 U.S.C. § 3161.

15
16 DATED: January 9, 2013

MELINDA HAAG
United States Attorney

17
18
19 /s/
ROBERT S. LEACH
ADAM A. REEVES
Assistant United States Attorneys

20
21 DATED: January 9, 2013

GAIL SHIFMAN, ESQ.
Law Offices of Gail Shifman

22
23
24 /s/
GAIL SHIFMAN, ESQ.
Counsel to Defendant Bassam Salman

25
26 ///

27 ///

28 ///

ORDER EXCLUDING TIME

Pursuant to stipulation, it is HEREBY ORDERED as follows:

The Court finds that the ends of justice served by granting a continuance from January 8, 2013, to June 24, 2013, outweigh the best interests of the public and the defendant in a speedy trial. The Court ORDERS that the time between January 8, 2013, to June 24, 2013, shall be excluded in computing the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) & (B)(iv).

DATED: January ¹⁴ __, 2013

